



10/12/2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Horizon Theatre, located in Atlanta, Georgia that provides approximately 346 performances per year to 45,000 audience members and education programs to 343 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Horizon Theatre Company's mission is to connect people, inspire hope, and promote positive change through contemporary theatre and the stories of our times. We seek to empower, inspire, celebrate, enlighten, and build bridges between diverse audiences and to ignite new artists and audiences with a passion for theatre that connects to their lives.

Since its founding in 1983, Horizon Theatre Company has been a leader in the production and development of contemporary theatre in the Southeast. Horizon presents professional Atlanta, Southeastern, and World Premieres of new and recent plays and develops new artists and audiences through education and outreach programs. Now in our 33rd season, Horizon seeks outstanding new plays by today's playwrights – plays that reflect or challenge the lives of the diverse people living in the urban Southeast. Horizon has won both critical acclaim and popular success with its productions of unexpected, exceptional new plays, producing 5-8 plays annually in our 172-seat theatre and regularly remounting shows in larger venues to reach new audiences. We operate on a Small Professional Theatre Contract with the Actors' Equity union and employ more than 150 Atlanta based theatre professionals. Horizon has produced over 130 plays; we currently reach over 45,000 people annually with our plays and programs.

Horizon has also received national acclaim as a center for development of new plays and writers from our region. Our New South Play Festival and PlayWorks program, now in its 19th year, develops and produces new plays from, for, and about the diverse contemporary South with an emphasis on plays by women, artists of color, and writers based in the South.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We

support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

We are fortunate at Horizon to own all of the microphones that we use and to have an experienced audio technician with a BFA in Technical Theatre (emphasis in sound design) on staff as a contractor. Horizon offers approximately 346 performances per year with at least 206 of these, requiring wireless microphones. Our microphones have a life span of approximately 5 years and we usually use 5-10 units per presentation or performance. We do not utilize IFB's or cue and control devices. We use a combination of Low UHF (channels 14-36, 470 to 608 MHz) and High UHF (channels 38-51, the 600 MHz band, 614 MHz to 660 MHz). We do not utilize any bands outside of the TV channels. In addition, our G-Block (540-590 MHz & 610-660 MHz) microphones are able to tune to more than one frequency and are all analog. Currently, we do not own 700 MHz band microphones.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,



Lisa Adler

Co-Artistic/Producing Director